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April 8, 2003

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APR -- 8 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Via Electronic Mail

Thomas Buckley, Esq.
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: CC Docket No. 96-45
Highland Cellular, Inc.
Petition for Designation as an ETC in the Commonwealth of Virginia

Dear Mr. Ruckley:

We write in response to your request for additional information regarding the petition of Highland Cellular, Inc. ("Highland") for designation as an eligible telecommunications carrier ("ETC") in the Commonwealth of Virginia pursuant to 47 U.S.C. § 214(e)(6). Specifically, you requested (1) information to support Highland's discussion of "wide local calling areas" on p. 17 of its Petition; and (2) a description of the company's commitment to construct facilities to extend service to unserved or underserved areas.

A. Local Calling Areas

As described below, even the smallest local calling area offered to Highland's subscribers is significantly larger than those provided under the flat-rate local service packages offered by the ILECs in the vicinity of Highland's proposed ETC service area.

At the outset, we wish to clarify that "local calling area" means the geographic area within which a customer may terminate calls originating from his or her "home area" without incurring per-minute long distance charges. The term "home area" signifies the geographic area in which a mobile subscriber may travel and originate calls without incurring per-minute

roaming charges. (The "home area" for all Highland customers is the 8-county area covered by its cellular license.)

Highland is the A-side cellular licensee in the Virginia-2 (call sign KNKQ415) and West Virginia-7 (call sign KNKN618) Rural Service Areas ("RSAs"). The combined service territory covered by Highland's two cellular authorizations comprises Fayette, Greenbrier, Mercer, Monroe, Raleigh and Summers counties in West Virginia, and Bland and Tazewell counties in Virginia. This X-county service territory comprises the "home area" in which all Highland customers may place calls without incurring roaming charges.

This 8-county area is also the smallest local calling area offered by Highland, giving all customers the ability to make toll-free calls to any of the 43 wire centers (or portions thereof) that are within Highland's licensed service territory. Highland also offers a statewide rate plan, allowing for toll-free calls to numbers anywhere in West Virginia.¹ Highland's customers may also select from rate plans providing toll-free calling anywhere within a 4-state region consisting of Virginia, West Virginia, Pennsylvania and Ohio, or a 21-state region largely covering the East Coast. Finally, Highland offers nationwide rate plans with toll-free calling to numbers anywhere in the contiguous U.S.

In short, Highland's customers may choose from local calling areas consisting of (1) Highland's 8-county service territory, (2) the entire state of West Virginia plus Bland and Tazewell counties in Virginia, (3) a 4-state region surrounding the home area, (4) a 21-state East Coast area, or (5) the contiguous U.S.

Based on a review of tariff information currently available on the web site of Verizon South, Inc. - Virginia ("Verizon"), Highland believes that even its smallest local calling area is substantially larger than the largest local calling areas offered by ILECs in the vicinity.² According to the Verizon tariff, the size of the local calling area depends on the wire center in which a given customer resides. Copies of the relevant Verizon tariff pages, highlighted for ease of reference, are attached.

¹ A West Virginia-wide local calling area is of significant value to many Virginia consumers in Bland and Tazewell counties, since communities in these areas are essentially border towns and generally have close ties with West Virginia.

² See Verizon South, Inc., General Customer Services Tariff, Section 3 (Basic Local Exchange Service) available at <https://retailgateway.bdi.gte.com:1490/cyberdocs.asp?optState=VA>. Highland has chosen Verizon for the purposes of this analysis because Verizon is likely to offer larger local calling areas than those offered by the substantially smaller ILECs whose territory Highland serves. While Verizon has recently sought to make changes to certain of its local calling areas in Virginia, Highland has not studied these filings and has limited its analysis to the Verizon tariff available on Verizon's web site.

While Highland's smallest local calling area consists of all or part of 43 wire centers in two states, the largest local calling areas available to Verizon's customers who reside within Highland's proposed ETC service area — specifically, those residing in the Pocahontas and Richlands wire centers — consist of only 8 wire centers. Verizon customers elsewhere in the relevant area have smaller areas: Bluefield (7 wire centers), Jewell Ridge (5), Rocky Gap (5), Tazewell (7). No larger flat-rate local calling area appears to be available, as Verizon's extended area calling service appears to have been discontinued.

Although the majority of Highland's licensed service territory is located in West Virginia, even the Virginia portion of its smallest local calling area is comparable to or larger than the broadest ILEC local calling areas. Specifically, Highland's subscribers may place calls to all 10 of the Virginia wire centers that are wholly or partially covered by its service territory. Verizon subscribers living in the Richlands exchange are limited to a total of 8 wire centers, all in Virginia. Verizon subscribers living in the Pocahontas exchange are limited to just 3 Virginia wire centers; the rest are in West Virginia.

In sum, based on Highland's review of currently available tariffs, the ILECs in the vicinity of Highland's proposed ETC service area offer their customers significantly smaller local calling areas than those offered by Highland, and none of them offers a statewide, regional or nationwide local calling area as Highland does.

B. Build-out Commitments.

Highland's existing facilities within its Virginia service territory cover the main towns and roadways within Bland and Tazewell counties. Highland currently has seven cell sites within these counties with three additional sites planned to fill in the coverage along I-77 and Virginia Route 460. Many of the towns and roads outside of the main corridors are extremely rural, with mountainous and leafy terrain. Although Highland has demand from customers within these areas, the company has no plans to construct additional facilities in the absence of high-cost support.

Access to high-cost support will allow Highland to build as many as three new cell sites in the near future to increase its coverage and meet consumer demand in these areas, and the company is prepared to commence site acquisition, execution of an equipment purchase order, and related Facilities acquisition at the earliest possible date upon receipt of support. Specifically, with receipt of high-cost support, Highland plans to build facilities to the following areas:

- Pocahontas, Boissevain and Falls Mills are likely to be serviced by one cell site.

Thomas Buckle). Esq
April 8, 2003
Page 4

- A cell site south of Tazewell would provide coverage to the town of Asberrys.
- A cell site north of Tazewell would provide coverage to the towns of Adria, Horspen and Bishop.

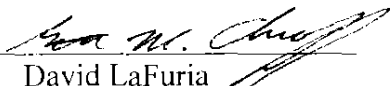
All of the areas identified above are in remote regions of Highland's proposed ETC service area. High-cost support invested there will significantly improve the quality of service that customers will receive, and will promote the universal service objective of increasing access to telecommunications service in unserved and underserved areas. Highland will use high-cost support to improve service to these areas, and it **will** continue to seek out and invest in areas where service quality needs to be improved.

Once again, we appreciate the opportunity to present this supplemental information. Should you have any questions or require any additional information, please contact undersigned counsel directly.

Respectfully submitted,

Highland Cellular, Inc

By:


David LaFuria
Steven Chernoff
Its Counsel

cc: Eric Einhorn, Esq.
Mark Seifert, Esq.
Anita Cheng, Esq.
Cara Voth, Esq.
Marlene H. Dortch, Secretary (by hand)

Enclosure

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIA

ISSUED: March 1, 2002
BY: President
Richmond, Virginia

Section 3
Sixth Revised Page 6
Cancels Fifth Revised Page 6
EFFECTIVE: April 2, 2002

S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)

S3.2.3 Rates

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- a The rates shown below are billed monthly in advance. A customer's billing cycle, regardless of the number of days in the month is considered to be thirty (30) days.
- b The Automatic Access Line 1-10 Lines rate applies to the first ten (1st 10) lines and the 11+ Lines rate applies to the eleventh and over lines, i.e., if a customer has 18 PEX lines, the 1-10 Lines rate applies to the first ten lines and the 11+ Lines rate applies to the eleventh through the eighteenth lines.
- c See Section S2.6 for rules and regulations pertaining to the movement of exchanges to a different Rate Group.

| GSEC/OSC | Rate Group | individual Access Line | | Automatic Access Line (PBX Trunk) | |
|-----------------------------------|------------|------------------------|-------------------------|-----------------------------------|----------------------------|
| | | Residence R1/74864 | Business B1/11135 | 1-10 Lines AALB/11823 | 11+ Lines AALB11+/10280 |
| Alberta | 4 | \$ 10.42 | \$ 21.96 | \$ 44.63 | \$ 37.94 |
| Allwood | 9 | 14.49 | 32.15 | 65.12 | 55.35 |
| Amherst (includes Sweet Briar) | 8 | 13.65 | 30.06 | 61.03 | 51.88 |
| Appomattox | 8 | 13.65 | 30.06 | 61.03 | 51.88 |
| Arcola ELS Adder? | 10 | 15.45 +.55 16.00 | 34.17 +1.22 35.39 | 69.29 +2.47 71.76 | 58.90 12.40 61.00 |
| Barnesville | 6 | 11.92 | 25.96 | 52.82 | 44.90 |
| Big Prater | 5 | 11.19 | 23.98 | 48.81 | 41.49 |
| Big Rock | 5 | 11.19 | 23.98 | 48.81 | 41.49 |
| Bluefield | 6 | 11.92 | 25.96 | 52.82 | 44.90 |
| Bowling Green | 7 | 12.76 | 28.05 | 56.92 | 48.38 |
| Eoydton | 5 | 11.19 | 23.98 | 48.81 | 41.49 |
| Boyhins | 6 | 11.92 | 25.96 | 52.02 | 44.90 |
| Bridgewater | 0 | 13.65 | 30.06 | 61.03 | 51.88 |
| Broadway | 8 | 13.65 | 30.06 | 61.03 | 51.88 |

Note: Arcola Extended Local Service (ELS) adder provides for unlimited calling to Washington, D.C.

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIAISSUED: March 1, 2002
BY: President
Richmond, VirginiaSection 3
Fourth Revised Page 8.1
Third Revised Page 8.1
EFFECTIVE: April 2, 2002

S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)

S3.2.3 Rates (Continued)

| | Rate Group | Individual Access Line | | Automatic Access Line (PBX Trunk) | | |
|------------------|---------------|---------------------------|----------|--------------------------------------|----------------------|-----|
| | | Residence | Business | 1-10 Lines | 11+ Lines | |
| | | R1/74864 | B1/11135 | AALB/11823 | AALB11+/10280 | |
| Hinton | 8 | \$ 13 65 | \$ 30.06 | \$ 61.03 | \$ 51.88 | (T) |
| Holland | 10 | 15 45 | 34.17 | 69.29 | 58.90 | |
| Hurley | 5 | 11 19 | 23 98 | 48.81 | 41.49 | (T) |
| Independent Hill | 10 | 15 45 | 34.17 | 69.29 | 58.90 | |
| Irvington | 5 | 11 19 | 23.98 | 48.81 | 41.49 | (I) |
| Ivor | 7 | 12 76 | 28.05 | 56.92 | 48.38 | |
| Jarrall | 5 | 11 19 | 23.98 | 48.81 | 41.49 | (I) |
| Jewell Ridge | 6 | 11.92 | 25.96 | 52.82 | 44 90 | |

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIA

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Richmond, Virginia

Section 3
Fifth Revised Page 9.1
Cancels Fourth Revised Page 9.1
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S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)

S3.2.3 Rates (Continued)

| | Rate Group | Individual Access Line | | Automatic Access Line (PBX Trunk) | | |
|---|---------------|---------------------------|-----------------|--------------------------------------|------------------|-----|
| | | <u>Residence</u> | <u>Business</u> | <u>1-10 Lines</u> | <u>11+ Lines</u> | |
| GSEC/IOSC: | | R1/74864 | B1/11135 | AALB/11823 | AALB11+/10280 | |
| Occoquan (includes Woodbridge) | 10 | \$15.45 | \$34.17 | \$ 69.29 | \$58.90 | (T) |
| Old Church | 10 | 15 45 | 34 17 | 69.29 | 58.90 | (I) |
| Pamplin | 9 | 14 49 | 32 15 | 65.12 | 55.35 | |
| Pocahontas | 6 | 11 92 | 25 96 | 52.82 | 44.90 | |
| Port Royal | 8 | 13 65 | 30 06 | 61.03 | 51.88 | |
| Princess Anne (includes Pungo and Shipps Corner) | 10 | 15 45 | 34 17 | 69.29 | 58.90 | |

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIA

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Richmond, Virginia

Section 3
Fifth Revised Page 10
Cancels Fourth Revised Page 10
EFFECTIVE: April 2, 2002

S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)

S3.2.3 Rates (Continued)

| GSEC/IOSC | Rate | Individual Access Automatic Access Line | | | |
|---------------------------------|------|---|-----------------------------|---------------------------------|-----------------------------------|
| | | (PBX Trunk) | | | |
| | | <u>Residence</u> R1/74864 | <u>Business</u> B1/11135 | <u>1-10 Lines</u> AALB111823 | <u>11+ Lines</u> AALB11+/10280 |
| Raphine | 8 | \$ 13 65 | \$ 30 06 | \$ 61.03 | \$51.88 |
| Reedville | 5 | 11 19 | 23 98 | 48.81 | 41.49 |
| Richlands | 7 | 12.76 | 28 05 | 56.92 | 48.38 |
| Rocky Gap | 7 | 12.76 | 28 05 | 56.92 | 48 38 |
| Saluda | 8 | 13 65 | 30 06 | 61.03 | 51.88 |
| Smithfield | 10 | 15 45 | 34 17 | 69.29 | 58.90 |
| South Brunswick | 6 | 11 92 | 25 96 | 52.82 | 44.90 |
| Stafford | 10 | 15 45 | 34 17 | 69.29 | 58.90 |
| Stony Creek | 9 | 14 49 | 32 15 | 65 12 | 55.35 |
| Surry | 10 | 15 45 | 34 17 | 69.29 | 58.90 |
| Tappahannock | 8 | 13 65 | 30 06 | 61.03 | 51.88 |
| Tazewell | 7 | 12.76 | 28 05 | 56.92 | 48 38 |
| Triangle (includes Quantico) | 10 | 15 45 | 34 17 | 89.29 | 58.90 |
| Wakefield | 7 | 12 76 | 28 05 | 56.92 | 48.38 |
| Warsaw | 5 | 11 19 | 23 98 | 48.81 | 41.49 |
| Weyers Cave | 8 | 13 65 | 30 06 | 61.03 | 51.88 |
| Windsor | 10 | 15 45 | 34 17 | 69.29 | 58.90 |

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GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC
VIRGINIA

Section 3
Second Revised Page 23
Cancels First Revised Page 23
EFFECTIVE: May 17, 2002

ISSUED: April 17, 2002
BY: President
Richmond, Virginia

S3. BASIC LOCAL EXCHANGE SERVICE

s3.3 Extended Area Calling Service (EAC) (Service Discontinued May 17, 2002)

(C)

(D)

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC
VIRGINIA

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Richmond, Virginia

Section 3
Sixth Revised Page 12
Cancels Fifth Revised Page 12
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S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)S3.2.4 Calling Areas

The rates specified in Section S3 2.3, entitles the "Exchange" customer to an unlimited number of calls to his/her home exchange and to the "Additional Exchanges" listed below

| <u>Exchange</u> | <u>Additional Exchanges</u> | |
|--------------------------|--|---|
| Alberta | Lawrenceville McKenney' | (N) |
| Allwood | Amherst Big Island' Gladstone | Lynchburg' Piney River' |
| Amherst | Allwood Gladstone Lovingsston' | Lynchburg' Piney River* |
| Appomattox | Concord' Gladstone | Lynchburg' Pamplin |
| Arcola ^{Note 1} | Alexandria/Arlington* (Includes the Pentagon) Braddock' Dale City Dulles Dulles Metro Engleside' Fairfax/Vienna* Falls Church/McLean* Haymarket | Herndon' Independent Hill Leesburg' Lorton Lorton Metro Manassas Nokesville Occoquan Stafford Triangle Washington, D.C. |
| Barnesville | Chase City Clarksville | Drakes Branch Keysville |
| | | (N) (N) |
| Big Prater | Big Rock Davenport' Dwight Grundy | Hurley Maxie Oakwood |
| | | (T) |
| Big Rock | Big Prater Dwight Grundy | Hurley Maxie Oakwood |
| Bluefield | Bluefield, WV* Bluewell, WV* Bramwell, WV* | Rocky Gap Pocahontas Tazewell |
| Bowling Green | Dawn King William Ladysmith | Port Royal Tappahannock |
| | | (N) (N) |

Note 1 Only Arcola customers can subscribe to Dulles Metro Service as an FX service

* Non Verizon South Exchange

GENERAL CUSTOMER SERVICE STARIFF

VERIZON SOUTH INC.
VIRGINIASection 3
Fifth Revised Page 18
Cancels Fourth Revised Page 18
EFFECTIVE April 2, 2002ISSUED March 1, 2002
BY: President
Richmond, Virginia

S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)S3.2.4 Calling Areas (Continued)

(T)

| <u>Exchange</u> | <u>Additional Exchanges</u> | |
|-------------------------|---|---|
| Hurley | Big Prater Big Rock Dwight | Grundy Maxie Oakwood |
| Independent Hill | Alexandria/Arlington* (includes the Pentagon) Arcola Braddock' Dale City Dulles Dulles Metro Engleside' Fairfax/Vienna* Falls Church/McLean* | Haymarket Herndon' Lorton Lorton Metro Manassas Nokesville Occoquan Stafford Triangle |
| Irvington | Kilmarnock Lively Saluda | (N) |
| Ivor | Courtland Franklin Smithfield | Wakefield Windsor |
| Jarrall | Capron Empona Stony Creek | (N) I (N) |
| Jewell Ridge | Dwight Oakwood | Tazewell |
| Keerletown | Bergton' Bndgewater Broadway Dayton Edom Elkton | Grottoes Hamsonburg Hinion McGaheysville Weyers Cave |
| Keysville | Barnesville Charlotte Court House Chase City Drakes Branch | (N) (N) |
| Kilmarnock | Deltaville Heahsville Irvington | (N) (N) |
| King George | Chancellot Dahlgren | Fredencksburg' |

(N)

* Non-Verizon South Exchange

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIA

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BY: President
Richmond, Virginia

Section 3
Second Revised Page 20.1
Cancels First Revised Page 20.1
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S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)S3.2.4 Callins Areas (Continued)

| <u>Exchange</u> | <u>Additional Exchanges</u> | |
|--|--|---|
| Pamplin | Appomattox Concord | Lynchburg' |
| Pocahontas | Anawalt, WV* Bluefield Bluefield, WV* | Bluewell, WV* Bramwell, WV* Mayberry, WV* Tazewell |
| Port Royal | Bowling Green Fredricksburg* | Ladysmith Tappahannock (N) |
| Princess Anne (includes Pungo and Shippo Corner) | Cape Charles' Chuckatuck Crittenden Franklin Great Bridge Hampton* Hickory Holland Knotts Island, NC | Newport News' Norfolk/Virginia Beach' Peninsula' Poquoson* Portsmouth' Smithfield Suffolk' Whaleyville' Windsor |
| Raphine | Staunton* | |
| Reedville | Callao | Heathsville |
| Richlands | Davenport* Dwight Honaker* Jewell Ridge | Lebanon* Oakwood Tazewell |

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' Non-Venon South Exchange

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIA

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Richmond, Virginia

Section 3
Fifth Revised Page 21
Cancels **Fourth** Revised Page 21
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S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)

S3.24 Callins Areas (Continued)

| <u>Exchange</u> | <u>Additional Exchanges</u> | |
|-----------------|--|--|
| Rocky Gap | Bluefield Bluefield, WV* | Bluewell, WV* Tazewell |
| Saluda | Deltaville Farnham Gloucester Hayes Irvington | (N) Kilmamock King & Queen Lively Tappahannoch (N) |
| Smithfield | Crittenden Chuckatuck Dendron Franklin Great Bridge Hampton' Hickory Ivor Newport News' Norfolk/Virginia Beach' Peninsula' | Poquoson' Portsmouth* Princess Anne Suffolk* Surry Toano* Wakefield Whaleyville' Williamsburg* Windsor |
| South Brunswick | Emporia | (N) Lawrenceville |
| Stafford | Alexandria/Arlington* (includes the Pentagon) Arcola Braddock' Dale City Dulles Dulles Metro Engleside' Fairfax/Vienna* Falls Church/McLean* Fredericksburg' | Hartwood* Haymarket Herndon' Independent Hill Lorton Lorton Metro Manassas Nokesville Occoquan Triangle |
| Stony Creek | Capmn Dinwiddie' Empona Jarratt | (N) McKenney' Petersburg' Waverly* (N) |
| Surv | Claremont Dendron Hampton* Newport News' Peninsula' | (T) Poquoson' (T) Smithfield Toano' Williamsburg* |

* Non-Venzon South Exchange

GENERAL CUSTOMER SERVICES TARIFF

VERIZON SOUTH INC.
VIRGINIA

ISSUED: March 1, 2002
BY: President
Richmond, Virginia

Section 3
Second Revised Page 21.1
Cancels First Revised Page 21.1
EFFECTIVE: April 2, 2002

S3. BASIC LOCAL EXCHANGE SERVICE

S3.2 Flat Rate Service (Continued)

S3.2.4 Calling Areas (Continued)

| <u>Exchange</u> | <u>Additional Exchanges</u> | | | |
|------------------------------------|-----------------------------|-----|------------------|-----|
| Tappahannock | Bowling Green | (N) | Lively | (N) |
| | Colonial Beach | | Montross | |
| | Farmham | | Port Royal | |
| | King & Queen | | Saluda | |
| | King William | (N) | Wanaw | (N) |
| Tazewell | Bluefield | | Pocahontas | |
| | Honaker* | | Richlands | |
| | Jewel Ridge | | Rocky Gap | |
| Triangle (includes Quantico) | Alexandria/Arlington* | | Haymarket | |
| | (includes the Pentagon) | | Hemdon* | |
| | Arcola | | Independent Hill | |
| | Braddock' | | Lorton | |
| | Date City | | Lorton Metro | |
| | Dulles | | Manassas | |
| | Duiles Metro | | Nokesville | |
| | Engleside' | | Occoquan | |
| | Fairfax/Vienna* | | Stafford | |
| | Falls Church/McLean* | | | |
| Wakefield | Courtland | | Ivor | |
| | Dendron | | Smithfield | |
| | Franklin | | Waverly* | |
| Warsaw | Callao | (N) | Montross | (N) |
| | Farmham | | Tappahannock | (N) |
| | Hague | (N) | | |

* Non-Venon South Exchange